



THE CITY OF NEW YORK
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July 13, 2018

By ECF

Hon. Nina Gershon
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: David Arkorful v. New York City Department of Education
18 Civ. 3455 (NG) (SLT)

Dear Judge Gershon:

I am an Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, attorney for defendant the Board of Education of the City School District of the City of New York ("BOE") (sued herein as and also known as the "New York City Department of Education"). I write to respectfully request a 60-day extension of time for the BOE to respond to the Complaint. Plaintiff's counsel consents to this request.

Plaintiff, an employee of the BOE, brings this action pursuant to the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e, *et seq.* ("Title VII"), 42 U.S.C. § 1983, 42 U.S.C. § 12101 *et seq.*, the Americans with Disabilities Act of 1990, ("ADA"), New York Executive Law §§ 296 *et seq.* ("SHRL"), and the New York City Administrative Code §§ 8-101 *et seq.* ("CHRL"). Plaintiff alleges that he was not promoted and further demoted due to a disability and his national origin, race, and color. Plaintiff further alleges that he was subjected to a hostile work environment and not provided reasonable accommodations. Plaintiff filed a complaint with the BOE and alleges that afterwards, he was subjected to retaliation by his superiors.

The requested extension of time is necessary in order to allow the undersigned to conduct an investigation into the facts of the case and to formulate an appropriate response to the complaint. This is the first such request for additional time. There are no other currently scheduled deadlines that would be affected by this request. Accordingly, Defendant requests that its time to respond to the complaint be extended until September 15, 2018.

DISTRICT JUDGE NINA GERSHON

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Thank you for your consideration of this request.

Respectfully submitted,

/s/

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